

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :  
v. :  
DAVE DELANO VIRGIL :  
:

1:20CR 339-1



The Grand Jury charges that:

COUNT ONE

On or about August 11, 2016, in the County of Forsyth, in the Middle District of North Carolina, DAVE DELANO VIRGIL, an alien, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote and to vote in any Federal, State, and local election; in violation of Title 18, United States Code, Section 1015(f).

COUNT TWO

On or about August 11, 2016, in the County of Forsyth, in the Middle District of North Carolina, DAVE DELANO VIRGIL did falsely and willfully represent that he was a citizen of the United States; in violation of Title 18, United States Code, Section 911.

COUNT THREE

On or about November 8, 2016, in the County of Forsyth, in the Middle District of North Carolina, DAVE DELANO VIRGIL, an alien, cast a vote in

an election held for the purpose of electing a candidate for the office of President, Vice President, Member of the United States Senate, and Member of the House of Representatives; in violation of Title 18, United States Code, Section 611(a).

DATED: August 31, 2020

Matthew G.T. Martin  
BY: MATTHEW G.T. MARTIN  
United States Attorney

A TRUE BILL:

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FOREPERSON